## UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

HODELL-NATCO INDUSTRIES, INC.	)	CASE NO. 1:08 CV 2755
	)	
Plaintiff,	)	JUDGE: LESLEY WELLS
	)	MAGISTRATE JUDGE: GREG WHITE
-VS-	)	
	)	<b>MOTION OF PLAINTIFF HODELL-NATO</b>
SAP AMERICA, INC., et al.	)	INDUSTRIES, INC. FOR APPEARANCE BY
	)	COUNSEL PRO HAC VICE
Defendants.	)	<u> </u>

Plaintiff Hodell-Natco Industries, Inc. ("Hodell"), by and through its undersigned counsel, respectfully moves this Court, pursuant to Local Rule 83.5(h), for an Order permitting Laura A. Myers to appear in the above captioned matter as counsel for Hodell.

In support of this Motion, counsel for Hodell states as follows:

- 1. Hodell is presently represented by P. Wesley Lambert, James F. Koehler and the law firm of Koehler Neal LLC. Messrs. Lambert and Koehler are members of the bar of the State of Ohio, and are members of the bar of this Court, and maintain an office for the practice of law in Cleveland, Ohio.
- 2. Petitioner Laura A. Myers is currently and has been a member in good standing of the Bar of the State of New York since 2006, and her attorney registration number is 4392056. Ms. Myers is also currently and has been a member in good standing of the United States District Court for the Western District of New York since 2006, the United States District Court for the Northern District of New York since 2011, and the United States Court of Appeals for the Second Circuit since 2007.
- 3. Ms. Myers is currently providing legal services on behalf of the law firm of Koehler Neal, LLC, located at 1301 E. 9<sup>th</sup> Street, Suite 3330, Cleveland, OH, 44114. Ms.

Myers' telephone number is (216) 539-9700 and facsimile number is (216) 918-4369. Ms. Myers' email address is lmyers@koehlerneal.com.

4. Attached in support of this Motion, pursuant to Local Rule 83.5(h) is a Certificate of Good Standing dated July 24, 2012 indicating that Ms. Myers is an active member in good standing of the Bar of the State of New York.

Upon her admission *pro hac vice*, Ms. Myers will be associated with the undersigned members of the Bar of this Court.

Respectfully submitted,

/s/ P. Wesley Lambert

JAMES F. KOEHLER (0007904) lkoehler@koehlerneal.com
P. WESLEY LAMBERT (0076961) wlambert@koehlerneal.com
KOEHLER NEAL LLC
3330 Erieview Tower, 1301 East 9th Street
Cleveland, Ohio 44114
(216) 539-9370
(216) 916-4369 (facsimile)
Attorneys for Hodell-Natco Industries, Inc.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 30th day of July 2012, a copy of the foregoing Motion of Plaintiff for Appearance by Counsel *Pro Hac Vice* be served on the following by first-class U.S. mail, postage prepaid at the following addresses:

Roy A. Hulme
Reminger & Reminger
1400 Midland Bldg.
101 Prospect Avenue, W
Cleveland, OH 44115
216-430-2135
Fax: 216-687-1841
rhulme@reminger.com
Attorney for Defendants LSI-Lowery Systems, Inc. and the IBIS Group, Inc.

Gregory Star
Drinker Biddle
One Logan Square, Ste. 2000
Philadelphia, PA 19103-6996
(215) 988-2734
(215) 988-2757
Gregory.Star@dbr.com
Attorney for Defendants SAP AG, and SAP America, Inc.

/s/ P. Wesley Lambert
P. WESLEY LAMBERT (0076961)
Koehler Neal
3330 Erieview Tower
1301 East Ninth Street
Cleveland, OH 44114
216-539-9375
Fax: 216-916-4369
wlambert@koehlerneal.com

Attorney for Plaintiff